

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	
)	No. 1:18-CR-457-AJT
BIJAN RAFIEKIAN, et al.,)	
)	
<u>Defendants.</u>)	

MOTION FOR LEAVE TO ENTER A SPECIAL APPEARANCE
ON BEHALF OF KAMIL EKIM ALPTEKIN

Counsel for Kamil Ekim Alptekin hereby move the Court for an order granting leave to appear specially on Mr. Alptekin's behalf for the limited purpose of opposing the Government's Motion to Establish Crime Fraud Exception filed on May 31, 2019.¹ If the Court grants the instant motion, counsel request that it deem the attached opposition filed. A memorandum in support of this motion is filed herewith.

Respectfully submitted this 6th day of June 2019.

By: /s/ Rodney F. Page
Rodney F. Page (Virginia Bar No. 12401)
Jennifer Kies Mammen (Virginia Bar No. 73102)
BRYAN CAVE LEIGHTON PAISNER LLP
1155 F Street, N.W.
Suite 700
Washington, D.C. 20004
Telephone: (202) 508-6000
Facsimile: (202) 508-6200
Rodney.Page@bclplaw.com
Jennifer.Mammen@bclplaw.com

*Attorneys for Specially-Appearing Defendant
Kamil Ekim Alptekin*

¹ This motion, and any special appearance by Mr. Alptekin, if permitted, is made without prejudice to any other defenses, procedural or substantive, all of which are reserved.

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June 2019, I electronically filed the foregoing document entitled "MOTION FOR LEAVE TO ENTER A SPECIAL APPEARANCE ON BEHALF OF KAMIL EKIM ALPTEKIN" with the Clerk of Court using the CM/ECRF system, which will then send a notification of such filing to the counsel named below:

James P. Gillis
John T. Gibbs
Assistant United States Attorneys
UNITED STATES ATTORNEY'S OFFICE
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3700
Facsimile: (703) 299-3982
James.P.Gillis@usdoj.gov
John.Gibbs@usdoj.gov

Evan N. Turgron
Trial Attorney
Counterintelligence and Export Control
Section
National Security Division
UNITED STATES DEPARTMENT OF JUSTICE
950 Pennsylvania Ave., N.W.
Washington, D.C. 20530
Telephone: (202) 353-0176
Evan.Turgeon@usdoj.gov

Attorneys for the United States of America

Robert Powel Trout
TROUT CACHERIS & SOLOMON, PLLC
1627 Eye St. N.W.
Suite 1130
Washington, DC 20006
Telephone: (202) 464-3300
Facsimile: (202) 463-3319
rtrout@troutcacheris.com

James Edward Tysse
AKIN GUMP STRAUSS HAUER & FELD LLP
Robert S. Strauss Tower
2001 K Street NW
Washington, DC 20006
Telephone: (202) 887-4571
Facsimile: (202) 887-4288
jtysse@akingump.com

Attorneys for Bijan Rafiekian

By: /s/ Rodney F. Page
Rodney F. Page (Virginia Bar No. 12401)
BRYAN CAVE LEIGHTON PAISNER LLP
1155 F Street, N.W.
Suite 700
Washington, D.C. 20004
Telephone: (202) 508-6000
Facsimile: (202) 508-6200
Rodney.Page@bclplaw.com

*Attorney for Specially-Appearing Defendant
Kamil Ekim Alptekin*